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July 26, 2006

Jeff Pursley
Angela Melton
Nebraska Public Service Commission
300 The Atrium, 1200 N Street
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RE: Application No. 911-017?PI-116

Thank you for the opportunity to comment on the "Staff Proposed Interim Implementation Policy" regarding the interim policies for the administration of the Enhanced Wireless 911 Fund pending implementation of LB 1222.

Under the heading General Procedures, staff proposes that " All wireless service provider funding requests will also be published upon receipt and interested parties will have an opportunity to protest or intervene in the docket consistent with Commission rules of procedure. After the thirty (30) day intervention and protest period expires, if no other party has intervened or protested, the Commission could enter an order without a hearing on the information submitted if the PSAP agreed to waive its right to a hearing or schedule a hearing on the matter."

Alltel currently sends a monthly invoice to the Commission for reimbursement. The invoice is broken down by county and includes line items for recurring and non recurring charges by cell sites from our third party vendor and an amount for operating expenses based on customer counts. Alltel believes this information is confidential and is covered under our Nondisclosure Agreement filed with the State of Nebraska. These monthly reimbursement costs change if our third party vendor adjust costs and if our customer counts change (which they do each month). Alltel does not believe it is an efficient use of Commission time to open a docket each month to approve a wireless provider funding request.

As always, Alltel makes itself available to discuss the methodology it uses to submit funding requests for reimbursement. Also, Alltel urges the Commission to continue reimbursing wireless providers using the current administrative procedures that have been in place for several years.

Again, thank you for the opportunity to respond to the staffs proposed interim implementation policy. Should you have any questions, please do not hesitate to contact me at my office or on my cell phone.

Sincerely,

Bill Ashburn
Vice President-External Affairs